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ATTORNEYS

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June 16, 2014

Rachel Tennis
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Yosemite Creek Superfund Site
San Francisco, CA
Company Name: R.J. McGlennon Company, Inc. (Maclac)

Dear Ms. Tennis:

I am writing to follow up on our discussions at EPA on June 4, 2014. In that meeting, Michael McGlennon and I explained the reasons why R.J. McGlennon Company, Inc. (Maclac) should not have been named as a responsible party with respect to the Yosemite Creek Site. At the end of our discussions, we agreed that Maclac would submit a letter and declaration with supporting evidence demonstrating that Maclac has never manufactured or used any of the chemicals of concern at the Yosemite Creek Site. I am enclosing with this letter a declaration from Michael McGlennon as we agreed.

Maclac is a manufacturer of lacquers and coatings, but does not manufacture paints that contain any of the Yosemite Creek chemicals of concern. Maclac's business is primarily low-VOC lacquers and coatings, not interior or exterior house paint. Maclac has never manufactured paints or coatings that contain lead or PCBs. Maclac has never manufactured or sold wood preservative coatings. Maclac has never manufactured or sold coal tar creosote in any of its products.

EPA named Maclac as a potentially responsible party at the Yosemite Creek Site because Maclac was named as a potentially responsible party at the Bay Area Drum Site, and EPA has concluded that hazardous substances released at the Bay Area Drum Site ultimately made their way to the Yosemite Creek Site. The primary chemicals of concern at the Yosemite Creek site are: polychlorinated biphenyls (PCBs), chlorinated pesticides (DDT, chlordane, dieldrin) and metals (lead, zinc and mercury). Maclac was identified as a potentially responsible party at the Bay Area Drum Site based on its alleged disposal of barrels containing residues of toluene and xylenes. Those chemicals are not at issue with respect to the Yosemite Creek Site. They are also

volatile, and it is unlikely that they would have migrated from the Bay Area Drum Site to the Yosemite Creek Site.

After our meeting, Maclac conducted an investigation into its historical lacquer and coating formulations. Michael McGlennon, who attended our June 4 meeting, is the longest serving Maclac employee. His father founded the company in 1961. Michael McGlennon joined the company in 1977, and has personal knowledge of all of the product formulations since 1977.

We were fortunate that Maclac was able to retrieve Maclac's historical lacquer and coating formulations from an old DOS-based computer. The following are the 680 VOC formulations and thinner blends that Maclac manufactured during the period 1961 to 1997:

T-150 Lacquer Thinner Blend

T-123 Lacquer Thinner Blend

T-196 Lacquer Thinner Blend

S-67 Lacquer Sanding Sealer

G-26 Gloss Lacquer

F-12 Semi-Gloss Lacquer

U-10/U-11 White Lacquer Undercoat

These are the products that were contained or mixed in the drums that Maclac sent to the Bay Area Drum Site. Copies of the formulations for all of these products are attached to Michael McGlennon's declaration as Exhibit A. None of these formulations contain any of the COCs for the Yosemite Creek Site.

As we discussed during our meeting on June 4, it is imperative that EPA not send a Special Notice Letter to Maclac. Even if EPA never takes enforcement action against Maclac, EPA's designation of Maclac as a responsible party will likely lead other responsible parties at the Site to sue Maclac for contribution. The costs of defending such actions would be catastrophic for Maclac. Maclac has only 12 employees, and is not in a position to defend itself in prolonged litigation.

Under EPA's guidance, EPA will not issue a Special Notice Letter to a party unless there is sufficient evidence to make a preliminary determination of potential liability under Section 107 of CERCLA:

Rachel Tennis
June 16, 2014
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The RI/FS and RD/RA special notice letter should be sent to all parties *where there is sufficient evidence to make a preliminary determination of potential liability under §107 of CERCLA*. If there is doubt about whether available information supports issuance of the ... special notices, separate information request letters may be sent to such parties prior to issuing such notice.

Interim Guidance On Notice Letters, Negotiations, And Information Exchange (Mar. 19, 1987) (emphasis added).

In this case, there is *no evidence* on which EPA may make a preliminary determination of liability against Maclac. Maclac's status as a PRP at the Bay Area Drum Site is not in itself evidence of any fact establishing liability for the Yosemite Creek Site. There is no evidence to support a determination that Maclac "arranged for disposal" of any hazardous substance that has come to be located at the Yosemite Creek Site, and none of the other categories of liability under CERCLA apply. Maclac's response to EPA's Section 104(e) information request provides no evidence that would support a preliminary determination of liability.

As we emphasized during our meeting, Maclac is willing to open its doors and provide whatever information EPA would like regarding Maclac's operations and business. Maclac will allow EPA to inspect its site, and Mr. McGlennon will submit additional declarations on issues that EPA may identify and/or submit to a deposition. Under these circumstances, where EPA has full access to all of the available and relevant information, EPA cannot reasonably issue a Special Notice Letter without any factual basis to support a determination of liability.

Very truly yours,



R. MORGAN GILHULY

cc: Michael McGlennon (with enclosures)

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Attorneys for
R.J. McGlennon Company

IN RE: YOSEMITE CREEK SITE

**DECLARATION OF MICHAEL
MCGLENNON**

I, Michael McGlennon, hereby declare

1. I am the President and owner of R.J. McGlennon Company, Inc. I make this declaration of my own personal knowledge, except where stated on information and belief and, if called to testify to the matters stated herein, I could and would competently do so.

2. Maclac is a manufacturer of paints, lacquers and coatings. Maclac has 12 employees. Maclac's business is primarily low-VOC lacquers and coatings, not interior or exterior house paint.

3. I am the longest serving current employee of Maclac. My father, R. J. McGlennon, founded the company in 1961. I joined the company in 1977, and I have personal knowledge of the product formulations since that time.

4. To the best of my knowledge, Maclac has never manufactured paints or coatings that contain lead or PCBs. Maclac has never manufactured or sold wood preservative coatings. Maclac has never manufactured or sold coal tar creosote in any of its products.

5. Maclac was named as a responsible party at the Bay Area Drum Site and entered into a de minimis settlement to settle its liability with respect to that site. The only items that Maclac shipped to the Bay Area Drum Site were barrels that contained residues of VOC

1 mixtures. All of Maclac's other wastes were sent to other waste handlers. I was informed that
2 Maclac was named as a responsible party at the Bay Area Drum Site based on the presence of
3 xylenes and toluene residue in the drums that Maclac shipped to that site.

4 6. I have been advised that the chemicals of concern (COCs) for the Yosemite Creek
5 Site are: polychlorinated biphenyls (PCBs), chlorinated pesticides (DDT, chlordane, dieldrin)
6 and metals (lead, zinc and mercury). To my knowledge, none of Maclac's formulations ever
7 contained any of the COCs for the Yosemite Creek Site.

8 7. After a meeting with EPA on June 4, 2014, I conducted an investigation to find
9 available information regarding Maclac's historical lacquer and coating formulations.
10 Fortunately, I was able to retrieve some of Maclac's historical lacquer and coating formulations
11 from an old DOS-based computer.

12 8. The following are the 680 VOC formulations and thinner blends that Maclac
13 manufactured during the period 1961 to 1997:

14 T-150 Lacquer Thinner Blend

15 T-123 Lacquer Thinner Blend

16 T-196 Lacquer Thinner Blend

17 S-67 Lacquer Sanding Sealer

18 G-26 Gloss Lacquer

19 F-12 Semi-Gloss Lacquer

20 U-10/U-11 White Lacquer Undercoat

21 These products are the products that were contained in or mixed in the barrels that were sent to
22 the Bay Area Drum Site.

23 9. For completeness, I also list here the following 275 VOC formulations and thinner
24 blends that are currently being manufactured today:

25 T-275 Lacquer Thinner Blend

26 UCX-9007 White Lacquer Undercoat

27 SUX-2004 Lacquer Sanding Sealer

28 LUX-2000 Gloss Lacquer

1 10. True and correct copies of all of the 680 and 275 VOC formulations listed above
2 are attached to this declaration as Exhibit A.

3 11. Maclac also made and sold other products, including primer coatings for steel
4 fabricator companies, industrial maintenance coatings for metal parts companies, and white and
5 black lacquer topcoat for the cabinet shop industry. These products were a small part of the
6 business in comparison to the clear lacquer sales. I have looked for formulations for these
7 products but have not been able to find any from the time period before 1987. To the best of my
8 knowledge, none of these products ever contained lead or any of the COCs for the Yosemite
9 Creek Site. Moreover, these products were never sold or distributed in drums, only in five gallon
10 and one gallon containers, and Maclac never disposed of containers for these products at the Bay
11 Area Drum Site.

12 I declare under penalty of perjury under the laws of the State of California and the United
13 States of America that the foregoing is true and correct and that this declaration was executed this
14 12 day of June, 2014 at San Francisco, California.

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16 
17 MICHAEL MCGLENNON
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EXHIBIT A

MASTER FORMULA

NAME: T-150 LACQUER THINNER (T-88)
DATE: 06-04-2014

CODE: T-150

| LINE | VOLUME | MATERIAL | CODE | WEIGHT |
|------|--------|---------------------------|--------|--------|
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | 20.00 | MEK / METHYL ETHYL KETONE | SS-501 | 134.00 |
| 6 | 9.00 | BUTYL ACETATE | SS-400 | 66.15 |
| 7 | 12.40 | ETHYL ALCOHOL VANZOL A-1 | SS-303 | 83.82 |
| 8 | 6.00 | GLYCOL ETHER EB | SS-600 | 45.06 |
| 9 | 36.60 | LACQUER DILUENT | SS-102 | 222.53 |
| 10 | 16.00 | XYLENE | SS-200 | 116.00 |
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Total Weight : 667.56
Density : 6.68
Cost Per Gallon: 3.098

Total Volume : 100.00
Cost Per Pound : 0.464
Total Cost : 309.80

M A S T E R F O R M U L A

NAME: T-123 LACQUER THINNER
DATE: 06-04-2014

CODE: T-123

| LINE | VOLUME | MATERIAL | CODE | WEIGHT |
|------|--------|---------------------------|--------|--------|
| 1 | | | | |
| 2 | | | | |
| 3 | 25.00 | MEK / METHYL ETHYL KETONE | SS-501 | 167.50 |
| 4 | 10.94 | BUTYL ACETATE | SS-400 | 80.43 |
| 5 | 13.60 | ISOPROPYL ALCOHOL 99% | SS-302 | 89.06 |
| 6 | 2.98 | ISOBUTYL ALCOHOL | SS-301 | 19.96 |
| 7 | 4.48 | ISOBUTYL ISOBUTYRATE | SS-401 | 31.96 |
| 8 | 34.00 | LACQUER DILUENT | SS-102 | 206.72 |
| 9 | 9.00 | AROMATIC 100 SOLVENT | SS-202 | 65.52 |
| 10 | | | | |
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Total Weight : 661.15
Density : 6.61
Cost Per Gallon: 3.391

Total Volume : 100.00
Cost Per Pound : 0.513
Total Cost : 339.11

PHYSICAL PROPERTIES ANALYSIS

Formula: T-196 T-196 LOW VOC LACQUER THINNER

Date Printed: 6/4/2014

Class: THINN THINNER BLENDS

Status: A Active

Revision: 1/4/2004 IMPROVE BLUSH RESISTANCE

MIR = 1279 G/L

HMIS® Codes: H 2 F 3 Ph 0

PPE Codes:

Total Weight: 678.50

Cost/LB: \$ 1.02

Lead Time: 0

Markup Factor: 100.00%

MSDS Template:

Fixed Cost factor : 0

Total Volume: 99.92

Cost/Gal: \$ 6.91

Last Made: 9/10/2001

Loss Factor: 3.00%

Label Template:

Labor:

Density: 6.79

Total Cost: \$ 690.43

Output:

Loss Const.: 0.00 LB

| Line | Item Key | Loc'n | Description | Pounds | Gallons |
|------|----------|-------|---------------------------------------|--------|---------|
| 2 | SS-500 | SFRM | ACETONE | 376.20 | 56.95 |
| 3 | SS-501 | SFRM | MEK - METHYL ETHYL KETONE | 87.23 | 12.99 |
| 4 | SS-200 | SFRM | XYLENE | 65.25 | 8.99 |
| 5 | SS-503 | SFRM | MAK METHYL AMYL KETONE | 27.20 | 4.00 |
| 6 | SS-600 | SFRM | GLYCOL ETHER EB (BUTYL CELLOSOLVE) | 30.04 | 4.00 |
| 7 | SS-400 | SFRM | BUTYL ACETATE | 62.47 | 8.49 |
| 8 | SS-301 | SFRM | ISOBUTYL ALCOHOL | 30.11 | 4.50 |

QUALITY CONTROL INFORMATION

Description Range Low Target Value Range High

P H Y S I C A L P R O P E R T I E S A N A L Y S I S

Formula: 30-S-101 F-12 SEMI-GLOSS LACQUER

Date Printed: 06/04/14
 Class: S030 Hi VOC Standard Lacquer
 Status: I Inactive
 Revision: Discontinued Efka

HMIS® Codes: H 2 F 3 Ph 0
 PPE Codes:

* * * N/A * * *

| | | |
|------------------------|---------------------|-----------------------|
| Total Weight: 401.15 | Total Volume: 54.98 | Density: 7.30 |
| Cost/LB: \$ 1.03 | Cost/Gal: \$ 7.54 | Total Cost: \$ 414.35 |
| Lead Time: 0 | Last Made: 11/24/04 | Output: |
| Markup Factor: 100.00% | Loss Factor: 3.00% | Loss Const.: 0.00 LB |
| MSDS Template: 30MSD | Label Template: | |
| Fixed Cost factor : 0 | Labor: | |

| Line | Item Key | Loc'n | Description | Pounds | Gallons |
|------------------------|----------|-------|-------------------------------------|--------|---------|
| REVISED 9/13/99 | | | | | |
| FOR AIM REGULATION | | | | | |
| (THIS IS G-26 BASE) | | | | | |
| 5 | T-150 | SFRM | T-150 LACQUER THINNER | 241.50 | 36.12 |
| 6 | T-196 | SFRM | T-196 LOW VOC THINNER | 51.19 | 7.54 |
| ADD BELOW WHILE MIXING | | | | | |
| 9 | RS-101 | SFRM | 1/2 SEC NITROCELLULOSE (STANDARD) | 28.38 | 2.69 |
| 10 | RS-100 | SFRM | 5-6 NITROCELLULOSE (STANDARD) | 7.05 | 0.67 |
| 11 | RS-400 | SFRM | FILTREZ 3320 / HARD RESIN | 53.68 | 5.65 |
| DISSOLVE ABOVE & ADD | | | | | |
| BELOW WHILE MIXING | | | | | |
| 15 | RL-407 | SFRM | DINP OR PALATINOL N | 16.92 | 2.09 |
| 16 | IAD-208 | SFRM | BYK-S732 FLOW-DEFOAMER 50% SOLUTION | 1.10 | |
| MIX AND ADD | | | | | |
| 19 | PE-103 | SFRM | OK-520 FLATTING PIGMENT | 1.32 | 0.08 |
| DISPERSE WELL & CHECK | | | | | |
| GLOSS | | | | | |

QUALITY CONTROL INFORMATION

| Description | Range Low | Target Value | Range High |
|----------------|-----------|----------------|------------|
| VISC/Z-2/INIT. | : 0.00 | 25 - 35 (30) | 0.00 |
| THIN WITH | : 0.00 | T-88 | 0.00 |
| THIN AMOUNT | : 0.00 | 100:23 BY WGT. | 0.00 |
| VISC/Z-2/THIN | : 0.00 | 20 - 25 (22.5) | 0.00 |
| GLOSS @60 Deg | : 0.00 | 50 - 60 (55) | 0.00 |

P H Y S I C A L P R O P E R T I E S A N A L Y S I S

Formula: 30-G-100 G-26 HIGH SOLIDS GLOSS LACQUER

Date Printed: 06/04/14
 Class: S030 Hi VOC Standard Lacquer
 Status: I Inactive
 Revision: Discontinued Efka

HMIS® Codes: H 2 F 3 Ph 0
 PPE Codes:

* * * N/A * * *

| | | |
|------------------------|----------------------|-----------------------|
| Total Weight: 732.33 | Total Volume: 100.48 | Density: 7.29 |
| Cost/LB: \$ 1.04 | Cost/Gal: \$ 7.60 | Total Cost: \$ 763.81 |
| Lead Time: 0 | Last Made: 11/24/04 | Output: |
| Markup Factor: 100.00% | Loss Factor: 3.00% | Loss Const.: 0.00 LB |
| MSDS Template: 30MSD | Label Template: | |
| Fixed Cost factor : 0 | Labor: | |

| Line | Item Key | Loc'n | Description | Pounds | Gallons |
|------------------------|----------|-------|-------------------------------------|--------|---------|
| REVISED 9/13/99 | | | | | |
| FOR AIM REGULATION | | | | | |
| 4 | T-150 | SFRM | T-150 LACQUER THINNER | 439.43 | 65.73 |
| 5 | T-196 | SFRM | T-196 LOW VOC THINNER | 93.82 | 13.83 |
| ADD BELOW WHILE MIXING | | | | | |
| 7 | RS-101 | SFRM | 1/2 SEC NITROCELLULOSE (STANDARD) | 52.44 | 4.97 |
| 8 | RS-100 | SFRM | 5-6 NITROCELLULOSE (STANDARD) | 13.04 | 1.24 |
| 9 | RS-400 | SFRM | FILTREZ 3320 / HARD RESIN | 98.22 | 10.33 |
| DISSOLVE AND ADD BELOW | | | | | |
| 12 | RL-407 | SFRM | DINP OR PALATINOL N | 31.38 | 3.87 |
| 13 | IAD-208 | SFRM | BYK-S732 FLOW-DEFOAMER 50% SOLUTION | 4.00 | |

Q U A L I T Y C O N T R O L I N F O R M A T I O N

| Description | Range Low | Target Value | Range High |
|----------------|-----------|------------------|------------|
| VISC/Z-2/INIT. | : 0.00 | 25 - 30 (27.5) | 0.00 |
| THIN WITH | : 0.00 | T-88 | 0.00 |
| THIN AMOUNT | : 0.00 | 100:23 BY WEIGHT | 0.00 |
| VISC/Z-2/THIN | : 0.00 | 20 - 25 (22.5) | 0.00 |
| GLOSS | : 0.00 | 80+ | 0.00 |

P H Y S I C A L P R O P E R T I E S A N A L Y S I S

Formula: 30-SS-103 S-67/S-66/S-69 HI SOLID SEALER

Date Printed: 06/04/14
 Class: S030 Hi VOC Standard Lacquer
 Status: I Inactive
 Revision: DISCONTINUED L9P (COST)

HMIS® Codes: H 2 F 3 Ph 0
 PPE Codes:

* * * N/A * * *

| | | |
|------------------------|----------------------|-----------------------|
| Total Weight: 732.28 | Total Volume: 100.33 | Density: 7.30 |
| Cost/LB: \$ 1.02 | Cost/Gal: \$ 7.46 | Total Cost: \$ 748.43 |
| Lead Time: 0 | Last Made: 11/11/04 | Output: |
| Markup Factor: 100.00% | Loss Factor: 3.00% | Loss Const.: 0.00 LB |
| MSDS Template: 30MSD | Label Template: | |
| Fixed Cost factor : 0 | Labor: | |

| Line | Item Key | Loc'n | Description | Pounds | Gallons |
|---------------------------|----------|-------|------------------------------------|--------|---------|
| REVISED 9/13/99 | | | | | |
| FOR AIM REGULATION | | | | | |
| 4 | T-150 | SFRM | T-150 LACQUER THINNER | 409.04 | 61.19 |
| 5 | T-196 | SFRM | T-196 LOW VOC THINNER | 122.49 | 18.05 |
| ADD BELOW UNDER AGITATION | | | | | |
| 8 | RS-101 | SFRM | 1/2 SEC NITROCELLULOSE (STANDARD) | 47.34 | 4.49 |
| 9 | RS-100 | SFRM | 5-6 NITROCELLULOSE (STANDARD) | 11.59 | 1.10 |
| 10 | RS-400 | SFRM | FILTREZ 3320 / HARD RESIN | 88.32 | 9.29 |
| MIX UNTIL DISSOLVE | | | | | |
| AND THEN ADD: | | | | | |
| 14 | RL-122 | SFRM | 52-5205 / 12-035 COCONUT ALKYD 60% | 24.00 | 2.77 |
| 15 | RL-407 | SFRM | DINP OR PALATINOL N | 16.17 | 1.99 |
| ADD WHLE MIXING | | | | | |
| 18 | PE-105 | SFRM | REGULAR STEARATE BAERLOCHER | 13.33 | 1.45 |
| COWLES IN | | | | | |
| ***** | | | | | |
| NOTE: RECORD ANY REWORK | | | | | |
| THAT GOES IN BATCH!! | | | | | |
| ***** | | | | | |

Q U A L I T Y C O N T R O L I N F O R M A T I O N

| Description | Range Low | Target Value | Range High |
|----------------|-----------|--------------------|------------|
| VISC/Z-2/INIT. | : 0.00 | 25 - 35 (30) | 0.00 |
| THIN WITH | : 0.00 | T-88 | 0.00 |
| THIN AMOUNT | : 0.00 | 100:23 BY WEIGHT | 0.00 |
| VISC/Z-2/THIN | : 0.00 | 20 - 25 (22.5) | 0.00 |
| DRY TIME | : 0.00 | 15 MINUTES TO SAND | 0.00 |

P H Y S I C A L P R O P E R T I E S A N A L Y S I S

Formula: 26-9F-102 U-1/U-10/U-11 WHITE UNDERCOAT

Date Printed: 06/04/14
 Class: S026 Hi VOC Lac Prim/Undercoat Pigm
 Status: A Active
 Revision: DISCONTINUED L9P (COST)
 INCREASED BYK-410

HMIS® Codes: H 2 F 3 Ph 1
 PPE Codes:

| | | |
|------------------------|----------------------|-------------------------|
| Total Weight: 907.54 | Total Volume: 100.66 | Density: 9.02 |
| Cost/LB: \$ 1.10 | Cost/Gal: \$ 9.95 | Total Cost: \$ 1,001.33 |
| Lead Time: 0 | Last Made: 05/30/03 | Output: |
| Markup Factor: 100.00% | Loss Factor: 3.00% | Loss Const.: 0.00 LB |
| MSDS Template: 26MSD | Label Template: | |
| Fixed Cost factor : 0 | Labor: | |

| Line | Item Key | Loc'n | Description | Pounds | Gallons |
|------|-------------------------------|-------|-----------------------------------|--------|---------|
| | REVISED 9/13/99 FOR | | | | |
| | NEW AIM REGULATION | | | | |
| | THIS USES 2660 PIGMENT SLURRY | | | | |
| | MAKE BELOW CLEAR LETDOWN | | | | |
| | AND THEN ADD 2660 PIGMENT | | | | |
| | SLURRY TO CLEAR | | | | |
| 10 | T-150 | SFRM | T-150 LACQUER THINNER | 420.84 | 62.95 |
| | ADD BELOW WHILE MIXING | | | | |
| 13 | RS-100 | SFRM | 5-6 NITROCELLULOSE (STANDARD) | 50.00 | 4.74 |
| 14 | RS-101 | SFRM | 1/2 SEC NITROCELLULOSE (STANDARD) | 15.00 | 1.42 |
| 15 | RS-400 | SFRM | FILTREZ 3320 / HARD RESIN | 50.00 | 5.26 |
| 16 | RL-407 | SFRM | DINP OR PALATINOL N | 10.30 | 1.27 |
| | MIX UNTIL DISSOLVED | | | | |
| | ADD 2660 SLURRY | | | | |
| 22 | 2660. | SFRM | 2660 PIGMENT SLURRY/ 26 SERIES | 360.00 | 24.87 |
| | MIX WELL AND ADD | | | | |
| 26 | AD-200 | SFRM | BYK-410 ANTI-SETTLE | 1.40 | 0.15 |
| | MIX IN WELL | | | | |

QUALITY CONTROL INFORMATION

| Description | Range Low | Target Value | Range High |
|-----------------|-----------|---------------------|------------|
| VISC/Z-3/INIT. | : 0.00 | 30 - 35 AS MADE | 0.00 |
| THIN AMOUNT | : 0.00 | T-88/ 100:35 BY WGT | 0.00 |
| VISC/Z-2/THIN | : 0.00 | 25 - 30 AFTER THIN | 0.00 |
| COLOR/FIRST STD | : 0.00 | FLAT WHITE | 0.00 |
| GLOSS @60 Deg | : 0.00 | CHECK FOR FLAT | 0.00 |

